

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>IN THE MATTER OF THE OPENING AND SEARCH OF:</b>	)	
	)	<b>CASE NO. 2:22-mj-744</b>
	)	
<b>UNITED STATES PRIORITY MAIL PARCEL 9505 5125 9236 2304 3600 04</b>	)	<b>MAGISTRATE JUDGE DEEVERS</b>
	)	

**AFFIDAVIT IN SUPPORT OF AN APPLICATION  
UNDER RULE 41 FOR A WARRANT TO SEARCH AND SEIZE**

I, Justin D. Koble, being duly sworn, do hereby state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a United States Postal Inspector with the United States Postal Inspection Service (“USPIS”) and have been so employed since July 2014. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS’s Columbus, Ohio field office. In this capacity, I am responsible for investigating the illegal use of the United States Mails for the purpose of transporting controlled substances such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of, among other statutes, Title 21, United States Code, Sections 841(a)(1) (manufacturing, distributing, or possessing with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I am responsible for investigating possible violations of Title 18, United States Code, Sections 1956 and 1957 (money laundering).

2. I have been involved in the investigation and discovery of drug contraband and drug proceeds on numerous occasions. I have personally been the affiant for search warrants that have resulted in the discovery of controlled substances and drug proceeds. My current assignment to the Columbus Processing and Distribution Center (“P&DC”) involves investigating the use of the US Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.

3. Experience and drug trafficking intelligence have demonstrated that Priority Mail and Priority Mail Express are commonly used to transport drugs and drug proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.

4. This affidavit is made in support of an application under Rule 41 of the Federal Rules of Criminal Procedure, for a warrant to search for and seize evidence, instrumentalities, contraband, and fruits of violations of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distributing, or possessing with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy), from the United States Priority Mail parcel bearing United States Postal Service (“USPS”) tracking number **9505 5125 9236 2304 3600 04** (hereinafter referred to as the “SUBJECT PARCEL”).

5. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

#### **SUBJECT PARCEL**

6. On or about November 15, 2022, USPIS interdiction personnel in Columbus, Ohio interdicted the SUBJECT PARCEL. The SUBJECT PARCEL is addressed to “Rebecca O’Neal, 4678 Hilton Ave, Columbus, Ohio 43228” with a return address of “Karen O’Neal, 823 Westbourne Dr, Hollywood, CA 90068”. The SUBJECT PARCEL is a white USPS Priority Mail, size large, flat-rate mailing box measuring approximately 12 ¼” x 12” x 6” and weighing approximately 6 pounds, 9 ounces. The SUBJECT PARCEL was mailed from the USPS Hollywood Station Post Office, 1615 Wilcox Avenue, Los Angeles, California 90028 on or about October 31, 2022. The \$22.45 in US postage affixed to the SUBJECT PARCEL was paid for in cash.





### PROBABLE CAUSE

7. Among the characteristics of the drug profile possessed by the SUBJECT PARCEL is the “source state” origination of the parcel, as well as the destination of the SUBJECT PARCEL.

8. Your affiant submits that the origin state of the SUBJECT PARCEL bears on the issue of probable cause here. For example, US Postal Inspectors, Special Agents of the Drug Enforcement Administration (“DEA”), and other intelligence sources have identified California as a source state for illegal drugs flowing into Central Ohio and a destination state for the proceeds from the sale of these illegal drugs. Based on my training and experience, I know drug traffickers frequently utilize various shipping and mail entities, including the United States Postal Service, for the shipment of controlled substances. Frequently the same shipping entity utilized for the shipment of controlled substances is also utilized for the shipment of the proceeds derived from the sale of these controlled substances.

9. On or about November 15, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the destination information contained on the SUBJECT PARCEL. The destination address, “4678 Hilton Ave”, by itself, is not a deliverable address in the 43228 zip code. The address 4678 Hilton Ave is the common address for a four-unit apartment complex, and without an apartment number, the

PARCEL is not deliverable. Due to this, on November 3, 2022, the PARCEL determined to be undeliverable and was scanned as “No Such Number” by USPS delivery personnel. On November 7, 2022, the PARCEL was scanned as “Return to Sender” and sent back to California. After US Postal Inspectors identified the PARCEL as potentially containing controlled substances and associated with an ongoing drug trafficking investigation, the PARCEL was returned to US Postal Inspectors in Columbus, Ohio for further investigation. Additionally, investigators were unable to associate the name “Rebecca O’Neal” with anyone in this apartment complex.

10. On or about November 14, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on the SUBJECT PARCEL. The return address, “823 Westbourne Dr.”, was determined to be a valid and deliverable address in the 90068 zip code. The name “Karen O’Neal” was not found to be associated with this address.

11. Regarding both the above-described return and destination addresses, I know through training and experience, that shippers of drugs and drug proceeds will often utilize a valid return address with a fictitious name to reduce the possibility of identification and apprehension by law enforcement. Additionally, while a valid delivery address is necessary to ensure the delivery of a parcel, a fictitious delivery name is often utilized for the same reasons previously discussed. Your affiant believes the omission of the apartment number on the PARCEL was a mistake by the mailer.

12. Because the SUBJECT PARCEL originated in California, a state known as a source of controlled substances being mailed to Central Ohio and the return and destination names indicated on the SUBJECT PARCEL were not found to be valid, investigators submitted the SUBJECT PARCEL for examination by a drug detecting canine.

#### **EXAMINATION BY DRUG DETECTING CANINE**

13. On or about November 16, 2022, United States Postal Inspectors contacted Trooper Jeff McNamara, Ohio State Highway Patrol, who is the handler for “Dale”, a Drug Detecting Canine. K-9 “Dale” has been certified by the Ohio Peace Officers Training Association since June 2022 for tracking, article search, and the detection of cocaine, heroin, methamphetamine, and their derivatives. K-9 “Dale” has had over 200 hours of training at the



Ohio Highway Patrol K9 Training Facility. Both in training and actual deployments, K-9 "Dale" has successfully detected narcotics, by demonstrating clear, passive alerts, and has established himself as a highly reliable police service dog.

14. The SUBJECT PARCEL was hidden among other parcels and USPS mail processing equipment and K-9 "Dale" was allowed to search the entire area. Trooper McNamara concluded that K-9 "Dale" did alert positively to the SUBJECT PARCEL. Based on that alert, Trooper McNamara concluded that the odor of one or more of the drugs K-9 "Dale" is trained and certified to detect was present.

15. Based upon training and experience, I respectfully submit that the above information is indicative of drug trafficking activity, and that, based on the above, there is probable cause to search the SUBJECT PARCEL.

16. If the SUBJECT PARCEL is found to contain controlled substances, these controlled substances will be seized as part of an ongoing drug trafficking investigation.

#### CONCLUSION


17. Based upon the foregoing facts and my training, experience, and expertise as a US Postal Inspector, I submit there is probable cause to search the SUBJECT PARCEL for controlled substances, drug proceeds, and other evidence of violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.


18. WHEREFORE, I respectfully request that the Court issue a warrant, authorizing agents of the USPS, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to open, view, and photograph, and seize, if necessary, the SUBJECT PARCEL and its contents.

19. The above information is true and correct to the best of my knowledge, information, and belief.

  
Justin D. Koble  
US Postal Inspector

Sworn and subscribed to me  
This 18th day of November 2022

  
Elizabeth A. Preston Deavers  
United States Magistrate Judge



Attachment A

United States Postal Service Priority Mail parcel 9505 5125 9236 2304 3600 04 addressed to "Rebecca O'Neal, 4678 Hilton Ave, Columbus, Ohio 43228," which is currently located at the USPS office in Columbus, Ohio.



Attachment B

- 1.) Any controlled substances which constitute evidence of violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846
- 2.) United States currency and/or drug proceeds
- 3.) Contraband
- 4.) Any items that constitute indicia of ownership or possession of the parcel

If the SUBJECT PARCEL is found to contain controlled substances or containers that could hold controlled substances, these controlled substances and / or containers will be seized as part of an ongoing drug trafficking investigation. If the SUBJECT PARCEL is found to contain items of evidentiary value which are not contraband, to include currency, these items will be documented, photographed, repackaged, and returned to the US Mail for delivery.